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FILED
2015 APR -7 PM 2:03
MARY ELLEN DUNLAP
CLERK OF SUPERIOR COURT
56 DEPUTY JP SV

Law Offices of
CARL D. MACPHERSON
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Tucson, AZ 85701

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PCC No.: 35932
ASB NO.: 6253

Attorney for Plaintiffs

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA
IN AND FOR THE COUNTY OF COCHISE

DANNY R. HATCH, JR. and DENICE R.)
HATCH, husband and wife,

Plaintiffs,

vs.

RONALD J. KLUMP and JANE DOE
KLUMP, husband and wife, ROY J. KLUMP
and JANE DOE KLUMP, husband and wife,
and DAYLA HEAP and JOHN DOE HEAP,
wife and husband,

Defendants

NO. CV 201400128

AFFIDAVIT OF
SANDRA ERHARDT

Assigned: Hon. John Keliher

SANDRA ERHARDT being first duly sworn deposes and says;

1. That she was the grantee to subject property on May 11, 1989, commonly known as 3983 N. Sheppard Road, Wilcox.
2. That during the time she owned subject property no member of the Klump family ever accessed their property via North Sheppard Road.
3. That the Klumps accessed their property via North Johnson Saddle Road from the South and North Johnson Road from the North via Page Ranch Road.
- 4.. Since purchasing subject property in 1989 until sale to the Plaintiff's said 60 foot

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strip has always been a private driveway to our property to the exclusion to all public including Defendant's.

5. The easterly 60 feet the sole means of access to the front door of our house and was fenced with no other outlet.

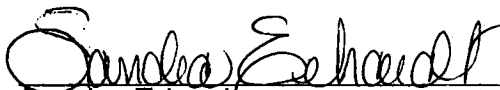
6. During our ownership thereof we always maintained said strip as a private road.

7. At the time we purchased subject property we were informed by the grantors that said strip was a private road and that it was our obligation to maintain same for reason that it was located on our property.

8. Between 1989 and 1996 said strip was not named.

9. In 1986 Cochise County Planning Department asked me to name the driveway so that they can assign a address thereto together with being informed that said driveway was private and not public access to my property.

Deponent further say if not.


Sandra Erhardt

SWORN AND SUBSCRIBED to this 3RD day of ~~March~~ ^{MP} April, 2015, by
Sandra Erhardt.


Notary Public

